Southeast District Office



95 Front Street gan, OH 43138

TELE: (740) 385-8501 FAX: (740) 385-6490

Bob Taft, Governor Christopher Jones, Director

August 8, 2001

RE: **BELMONT COUNTY**

WHEELING PITTSBURGH STEEL

MARTINS FERRY PLANT

COMPLIANCE SAMPLING INSPECTION

CORRESPONDENCE (IWW)

Mr. Bud Smith, Director, Env. Control Wheeling Pittsburgh Steel Corp. 1134 Market Street Wheeling, WV 26003

Dear Mr. Smith:

On July 11, 2001, I conducted a Compliance Evaluation Inspection (CEI) at the Wheeling Pittsburgh Steel Corporation Martins Ferry (WPS-MF) plant. Tom Waligura and Todd Koget represented the Wheeling Pittsburgh Corporation during the inspection.

The purpose of the inspection was to determine the facility's compliance status with the terms and conditions of the NPDES permit, Federal Number OH0011339, State Number OIC00020*CD. Wastewater samples were not collected. A copy of the inspection report form is attached.

Based on the evaluation of the facility, Wheeling Pittsburgh Steel Corporation Martins Ferry plant was found to be in non-compliance with the permit on the day of the inspection due to NPDES permit Part III violations and elevated zinc levels in the stormwater. The following comments/problems were noted as a result of the inspection:

- 1. The NPDES permit for WPS-MF expired on October 31, 1999. The company has applied for a permit renewal, however, a new permit has not yet been issued. Be advised that the expired permit remains in effect until the new permit is issued.
- 2. At outfall 001, the effluent limitation for zinc was exceeded on December 21 and 30, 1999. The hexavalent chromium limit was exceeded on January 16 and 30, and February 6, 2001. Every effort must be made to comply with the effluent limits contained in the NPDES permit.
- 3. WPS-MF is in violation of Part III, Section 11 of the NPDES Permit for the following unauthorized discharges:

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On April 17, 2000, a severe storm caused a bypass to occur over the weir wall for a total of 1 hour and 48 minutes, as influent to the sump/lift station exceeded the capacity of the pumps to pump all the flow to the treatment plant and the equalization (EQ) tank (1.5 inches total of rain, 1.01 inches which fell in 1 hour). The zinc concentration was tested to be 6300 ug/l (permit limit is 910 ug/l daily maximum).

On May 19, 2000, a severe storm caused a bypass to occur over the weir wall for a total of 4 hour and 32 minutes, as influent to the sump/lift station exceeded the capacity of the pumps to pump all the flow to the treatment plant and the EQ tank (1.64 inches of rain fell in 8 hours). The zinc concentration was tested to be 7900 ug/l (permit limit is 910 ug/l daily maximum).

On August 6, 2000, a severe storm caused a bypass to occur over the weir wall for a total of 1 hour and 11 minutes, as influent to the sump/lift station exceeded the capacity of the pumps to pump all the flow to the treatment plant and the EQ tank (1.62 inches of rain fell in 6.5 hours). The zinc concentration was tested to be 9500 ug/l (permit limit is 910 ug/l daily maximum).

4. In addition, WPS-MF is in non-compliance with Part III Item (12)(B)(2) for failing to measure the flow volume of bypassed flow. In the future, the results shall be reported to the Ohio EPA in accordance with Part III, Section 12 of the permit.

WPS-MF must make every effort to prevent unauthorized discharges over the influent sump weir wall.

- 5. Sampling and measuring the flow actually discharged is not being performed as required by the NPDES permit. The flow reported is comprised of measured WWTP influent flow and water consumed in wastewater treatment. The flow that bypasses treatment when it flows over the sump weir is not measured and is sometimes of significant volume. This flow is often contains high levels of zinc. It is not possible to determine compliance with the loading limits during a bypass event because the actual flow discharged is not measured. During a bypass event, the actual flow discharged is not sampled because the sampler only samples flow out of the WWTP. The NPDES permit requires the sample to be representative of the discharge. Therefore, WPS must submit a plan to revise the sampling and flow measurement at outfall 001 by February 1, 2002.
- 6. WPS-MF has submitted a Permit to Install application for an additional flow equalization holding tank and pumping capacity to prevent bypasses of storm/process water from occurring at outfall 001. Revisions have been requested in a separate letter.
- 7. The results of DMRQA #20 testing indicates acceptable results for all parameters tested.

8. The WPS-MF bioassay reports (performed by ATEL for WPS) for outfall 001 since the last inspection indicate the following results:

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6/21/99 - 6/22/99 .... not acutely toxic
8/24/99 - 8/25/99 .... not acutely toxic
3/16/00 - 3/18/00 .... not acutely toxic
7/13/00 - 7/15/00 .... acutely toxic
6/20/01 - 6/22/01 .... acutely toxic
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This information will be used to evaluate this facility during the next permit renewal.

- 9. I was unable to find copies of the results from the 2000 stormwater sampling. Please submit copies as soon as possible. Have stormwater samples been taken yet for 2001? If yes, please submit that data also.
- 10. Ohio EPA is very concerned about the level of zinc in the stormwater at your facility. Your Stormwater Management Plan does not address the sources of zinc contamination nor does it provide for management of this stormwater to control zinc contamination. WPS must address the problem of zinc contaminated stormwater leaving the site. Submit a revised Stormwater Management Plan that identifies areas and sources of contamination and actions to be taken to reduce or eliminate contamination.
- 11. It was noted during the inspection that there was a significant amount of oil and grease in the influent sump/pump station. Although there is a device for oil and grease removal, there is significant concern that during high flow events, especially when untreated flow discharges over the weir wall, oil and grease is being discharged. WPS must identify the sources of oil and grease in the plant and provide a control plan to minimize the discharge of this pollutant to the influent sump. Further, a more thorough method of removal and cleaning of the influent sump is required. A report must be provided to OhioEPA addressing this issue. Until proper effluent sampling is provided as required by paragraph 5 above, oil and grease samples shall be taken at the end of the effluent pipe during events when discharge occurs over the weir wall.
- 12. On April 3, 2001, WPS met with representatives of the Ohio Attorney General's Office, Ohio EPA and U.S. EPA Region 5 to discuss Ohio EPA's concerns regarding water pollution at the WPS facilities, including the Martin's Ferry plant. During the meeting, WPS was requested to provide an update describing the actions the company is willing to take to comply with Ohio's Water Pollution Laws. It is expected that once an acceptable compliance schedule for injunctive relief is reached, the agreement will be finalized thorough a consent order.

Wheeling Pittsburgh Steel Martins Ferry Plant Page 4

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets and U.S. EPA's <u>Facility Pollution Prevention Guide</u>, (EPA/600/R-92/088), you may contact the Ohio EPA Pollution Prevention Section at (740) 644-3469 or me for additional information.

Please respond to these comments within 20 days of receipt of this notice. If you have any questions, please contact me at (740) 380-5284 at your convenience.

Sincerely,

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Ms. Abbot Stevenson

Environmental Engineer

Permits and Enforcement Section

Division of Surface Water

AS/dh

Enclosure

c: Randy Bournique, DSW, CO

c: Gregory A. Poulos, Attorney General's Office

c: Sudir Desai, U.S. EPA, Region 5

c: AS file

NPDES COMPLIANCE INSPECTION REPORT

SECTION A: NATIONAL DATA SYSTEM CODING

Permit #	NPDES	Date	Inspection Type	Inspector	Fac. Type
OIC00020*CD	OH0011339	JULY 11, 2001	Е	S	2

SECTION B: FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
WHEELING PITTSBURGH STEEL CORPORATION	10:30 A.M.	NOVEMBER 1, 1995
MARTINS FERRY PLANT MARTINS FERRY, OHIO 43935	🖟 Exit Time 👵	Permit Expiration Date
MARTING PERCE, OTHO 43933	1:00 P.M.	OCTOBER 31, 1999

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
TODD KOGET, ENVIRONMENTAL COORDINATOR TOM WALIGURA, MANAGER, ENVIRONMENTAL CONTROL	(740) 283-5663 (304) 234-2682
Name, Address and Title of Responsible Official	Phone Number
MR. BUD SMITH WHEELING PITTSBURGH STEEL CORPORATION 1134 MARKET STREET WHEELING WV 26003	(304) 234-2662

SECTION C: AREAS EVALUATED DURING INSPECTION

S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated

M	Permit	U	Flow Measurement	_N_	Pretreatment
<u>S</u>	Records/Reports	N	Laboratory	_ <u>S</u> _	Compliance Schedules
S	Operations & Maintenance	U	Effluent/Receiving Waters	U	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	N	Other
N	Collection System				

SECTION D: SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

SEE ATTACHED LETTER

LIDO M	•	Ohio EPA, Southeast District Office	8/8/01	
ABBOT STEVENSON		•	DATE /	
•	0			

Russand Jaepan Ohio EPA, Southeast District Office

DATE

Sections E through K: Complete on all inspections as appropriate $(N/A = Not \ Applicable \ N/E = Not \ Evaluated)$

SECTION E: PERMIT VERIFICATION

Insp	ection Observations Verify the Permit	Yes	No	N/A	N/E
(a)	Correct name and mailing address of permittee	X			
(b)	Correct name and location of receiving waters	X			
(c)	Product(s) and production rates conform with permit application (industries)	X			
(d)	Flows and loadings conform with NPDES permit	X			
(e)	Treatment processes are as described in permit application/briefing memo	X			
(f)	New treatment process(es) added since last inspection		X		
(g)	Notification given to state of new, different, or increased discharges			X	
(b)	All discharges are permitted		X		
(i)	Number and location of discharge points are as described in permit		X		

Comments:

(h) & (i) SEE ITEM #3 IN LETTER

SECTION F: COMPLIANCE SCHEDULES/VIOLATIONS

	•	Yes	No	N/A	N/E
(a)	Any significant violations since the last inspection	X			
(b)	Permittee is taking actions to resolve violations	Х			
(c)	Permittee has compliance schedule		X		
(d)	Compliance schedule contained in				
(e)	Permittee is meeting compliance schedule			Х	

Comments:

(b) PTI SUBMITTED

SECTION G: OPERATION AND MAINTENANCE

TREATMENT WORKS:

Tre	atment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
(a)	Standby power available: Generator Dual Feed		X		
(b)	Adequate alarm system available for power or equipment failures	X			
(c)	All treatment units in service other than backup units	X			
(d)	Sufficient operating staff provided: # of shifts 3 Days/Week 7	X			
(e)	Operator holds unexpired license of class required by permit Class:			X	
(f)	Routine and preventive maintenance schedule/performed on time	X			
(g)	Any major equipment breakdown since last inspection		X		
(h)	Operation and maintenance manual provided and maintained	X			
(i)	Any plant bypasses since last inspection	X			
(j)	Regulatory agency notified of bypasses on MORS 800 No.	X			
(k)	Any hydraulic and/or organic overloads experienced since last inspection	Х			

- (b) 24 HOUR STAFFING
- (i) 3 OCCURRENCES SINCE LAST INSPECTION (MAY, 1999)
- (k) HYDRAULIC OVERLOADS DURING SOME RAINS

COLLECTION SYSTEM:

		Yes	No	N/A	N/E
(a)	Percent combined system:%			Х	
(b)	Any collection system overflows since last inspection (CSO SSO)		_		
(c)	Regulatory agency notified of overflow (SSOs)				
(d)	CSO O and M plan provided and implemented				
(e)	CSOs monitored and reported in accordance with permit				
(f)	Portable pumps used to relieve system				
(g)	Lift station alarm systems provided and maintained				
(h)	Are lift stations equipped with permanent standby power or equivalent				
(i)	Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection				
(j)	Any complaints received since last inspection of basement flooding				
(k)	Are any portions of the sewer system at or near capacity				

SECTION H: SLUDGE MANAGEMENT

(a)	Sludge Management Plan (SMP):		Submitted Date
			Approval Number
			Not submitted
		X	N/A
			•

		Yes	No	N/A	N/E
(b)	Sludge Management Plan current			X	
(c)	Sludge adequately disposed (Method: <u>LANDFILL</u>)	X			
(d)	If sludge is incinerated, where is ash disposed of?				
(e)	Is sludge disposal contracted (Name: <u>USA WASTE</u>)	X			
(f)	Has amount of sludge generated changed significantly since last inspection		X		
(g)	Adequate sludge storage provided at plant	X			
(h)	Land application sites monitored and inspected per SMP			Х	
(i)	Records kept in accordance with state and federal law			X	
(j)	Any complaints received in last year regarding sludge		X		
(k)	Is sludge adequately processed (digestion, dewatering, pathogen control)			X	

SECTION I: SELF-MONITORING PROGRAM

PART 1: FLOW MEASUREMENT

		Yes	No	N/A	N/E
(a)	Primary flow measuring device properly operated & maintained. Type of device: ultrasonic & parshall flume X calculated from influent weir Other (Specify:) ultrasonic & weir	х			
(b)	Calibration frequency adequate (date of last calibration <u>06/14/01</u>)	X		-	
(c)	Secondary instruments (totalizers, recorders etc.) properly operated and maintained	X			
(d)	Flow measurement equipment adequate to handle expected ranges of flows	Х			
(e)	Actual flow discharged is measured		X		
(f)	Flow measuring equipment inspection frequency: X Daily Weekly Monthly Other				

Comments:

(e) ACTUAL FLOW DISCHARGED IS NOT MEASURED. SEE ITEMS 4 AND 5 IN LETTER.

PART 2: SAMPLING

		Yes	No	N/A	N/Ę
(a)	Sampling location(s) are as specified by permit		X		
(b)	Parameters and sampling frequency agree with permit	X			
(c)	Permittee uses required sampling method	X			
(d)	Sample collection procedures are adequate		X		
	(i) Samples refrigerated during compositing	X			
	(ii) Proper preservation techniques used	X			
	Conform with 40 CFR 136.3	X			
(e)	Monitoring records (e.g., flow, pH, D.O., etc.) maintained for a minimum of three years including all original strip chart recordings (e.g., continuous monitoring instrumentation, calibration, and maintenance records)	x			
(f)	Adequate records maintained of sampling date, time, exact location, etc.	X			

Comments:

- (a) SAMPLES ARE TO BE TAKEN AT FINAL DISCHARGE POINT.
- (d) PROCEDURES ARE NOT ADEQUATE WHEN DISCHARGE OCCURS OVER THE WEIR WALL BECAUSE THE SAMPLES ARE NOT REPRESENTATIVE OF THE DISCHARGE.

PART 3: LABORATORY

Gen	neral (1901) and the second consequence of t	Yes	No	N/A	N/E
(a)	EPA approved analytical testing procedures used (40 CFR 136.3)	X			
(b)	If alternate analytical procedures are used, proper approval has been obtained			X	
(c)	Analyses being performed more frequently than required by permit		X		
(d)	(d) If (c) is yes, are results reported in permittee's self-monitoring report			X	
(e)	Commercial laboratory used (1) Parameters analyzed by commercial lab: ALL EXCEPT pH, FLOW AND RAINFALL (2) Lab name: ANTECH, LTD.	х			

Qua	ality Control/Quality Assurance		Yes	No	N/A	N/E
(f)	Quality assurance manual provided an				Х	
(g)	Satisfactory calibration and maintenar	ce of instruments and equipment	X			
(h)	Adequate records maintained	·	X			
(i)	Results of latest U.S. EPA quality assi	rrance performance sampling program:				
(i)	Results of latest U.S. EPA quality assi	urance performance sampling program:				
	Date:08/00X	Satisfactory				
	#20	Marginal				
	·	Unsatisfactory				
		•				

Comments:

(i) LEAD AND OIL AND GREASE WERE UNACCEPTABLE.

SECTION J: EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall#	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	NONE	NONE	CLEAR	SOME FOAM	NONE	COLORLESS	

SECTION K: MULTIMEDIA OBSERVATIONS

		Yes	No	N/A	N/E
(a)	Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories	X			
(b)	Do you notice staining or discoloration of soils, pavement, or floors		X		
(c)	Do you notice distressed (unhealthy, discolored, dead) vegetation		X		
(d)	Do you see unidentified dark smoke or dustclouds coming from sources		X		
(e)	Do you notice any unusual odors or strong chemical smells		X		
(f)	Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities		X		

If any of the above are observed, ask the following questions:

- (1) What is the cause of the conditions?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

Comments:

(a) SIGNIFICANT AMOUNTS OF OIL AND GREASE ARE REACHING THE WASTEWATER TREATMENT PLANT. USED FLUX TANKS ARE STOCKPILED OUTSIDE NEAR THE WWTP WITHOUT SECONDARY CONTAINMENT.



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street Logan, Ohio 43138-9031 (740) 385-8501 FAX: (740) 385-6490

George V. Voinovich Governor

July 26, 1999

BELMONT COUNTY
WHEELING PITTSBURGH STEEL
MARTINS FERRY PLANT
COMPLIANCE SAMPLING
INSPECTION
CORRESPONDENCE (I)

Dr. William Samples Director - Environmental Control Wheeling Pittsburgh Steel Corp. 1134 Market St. Wheeling, WV 26003

Dr. Samples:

On May 12, 1999, Jim Grow, Scott Schermerhorn and I conducted a Compliance Sampling Inspection (CSI) at the Wheeling Pittsburgh Steel Corporation Martins Ferry (WPS-MF) plant. Tom Waligura and Lisa Romito represented the Wheeling Pittsburgh Corporation during the inspection.

RE:

The purpose of the inspection was to determine the facility's compliance status with the terms and conditions of the NPDES permit, federal number OH0011339, state number 0IC00020*BD. Wastewater samples were collected and split with the company. Copies of the inspection report form and a summary of the effluent analyses are attached. Based on the evaluation of the facility, Wheeling Pittsburgh Steel Corporation Martins Ferry was found to be in non-compliance with the permit on the day of the inspection due to NPDES permit Part III violations and elevated zinc levels in the stormwater and unreliable oil and grease monitoring. The following comments/problems were noted as a result of the inspection:

- 1. The pH limit of 10.0 maximum was violated on November 11, 1998 and January 3, 1999. The zinc limit was violated on December 21, 1998. There have been no other effluent limit violations since the last inspection on April 13, 1998.
- 2. The results of the sampling indicate that WPS-MF was in compliance with the effluent limitations on the day of the inspection. However, the entity's results for oil & grease vary significantly from the OEPA results. Please explain. See also comments 6 and 7 below.
- 3. WPS-MF is in violation of Part III, Section 11 of the NPDES Permit for the following unauthorized discharge:

On August 24, 1998, a severe storm caused a bypass to occur over the weir wall for a total of 3 hours and 40 minutes, as influent to the sump/lift station exceeded the capacity of the pumps to pump all the flow to the treatment plant (2.85 inches of rain fell in 12 hours);

In addition, WPS-MF is in non-compliance with Part III Item (12)(B)(2) for failing to characterize the discharge by sampling to determine compliance with the effluent limitations. In the future, WPS-MF must sample the discharge over the weir wall to determine whether the discharge is in compliance with the effluent limitations. The results shall be reported to the Ohio EPA in accordance with Part II, Section 12 of the permit.

WPS-MF must make every effort to prevent unauthorized discharges over the influent sump weir wall. The issue of this discharge must be resolved during the drafting of the next NPDES permit.

4. The WPS-MF bioassay reports (performed by ATEL for WPS) for outfall 001 since the last inspection indicate the following results:

9/17/98-9/18/98 12/10/98-12/11/98 not acutely toxic; and acutely toxic.

The WPS-MF bioassay reports (performed by ATEL for WPS) for stormwater outfalls 002, 003 and 005 since the last inspection indicate the following results:

2/2/99-2/3/99 Effluents from outfalls 002 and 005 were all acutely toxic to fathead minnows and effluents from outfalls 002, 003 and 005 were acutely toxic to ceriodaphnia.

During these same dates the combined rainfall/process water discharge from outfall 001 was also sampled. The results of these bioassays are:

2/2/99-2/3/99 Effluent was acutely toxic.

This information will be used to evaluate this facility during the next permit renewal.

5. The chemical data from the stormwater testing continues to show very high levels of zinc in the runoff:

		Zinc, ug/l	
Outfall	11/25/96	4/30/98	2/1/99
001, grab	12,800	280	780
001, composite	12,300	130	490
002, grab	1,200	9,500	4500
002, composite	3,800	4,700	3200
003, grab	1,100	ŃΑ	330
003, composite	950	NA	2300
005, grab	1,000	2,400	3500
005, composite	530	2,700	73,000
Rainfall	NA	230	37

The water quality based NPDES permit limits for total zinc are 910 ug/l daily maximum and 505 ug/l 30 day average. Sixteen of the twenty-four samples exceeded the daily maximum limit.

OEPA is very concerned about the level of zinc in the stormwater at your facility. Your stormwater management plan does not address the sources of zinc contamination nor does it provide for management of this stormwater to control zinc contamination. WPS must address the problem of zinc contaminated stormwater leaving the site.

- 6. The results of the December 31, 1998 DMRQA testing indicates unacceptable results for oil and grease. An explanation for this result was provided to our laboratory by Tom Waligura on March 29, 1999. The 1997 DMRQA results also indicated unacceptable results for oil and grease. In light of the problem identified in item 7 below it is imperative that WPS's analysis of this parameter be reliable. It is recommended that WPS implement a QA/QC procedure by splitting oil and grease samples with Antech and another commercial lab to ensure quality results.
- 7. Once again it was noted during the inspection that there was a significant amount of oil and grease in the influent sump/pump station. Although there is a device for oil and grease removal, there is significant concern that during high flow events, especially when untreated flow discharges over the weir wall, oil and grease is being discharged. WPS must identify the sources of oil and grease in the plant and provide a control plant to

minimize the discharge of this pollutant to the influent sump. Further, a more thorough method of removal and cleaning of the influent sump is required/recommended. A report must be provided to OhioEPA addressing this issue. Until further notice oil and grease samples shall be taken at the end of the effluent pipe during events when discharge occurs over the weir wall.

8. WPS has obtained a Permit to Install for the addition of two fume scrubbers to capture fumes from the alkaline cleaning baths, the acid pickling tank, and the ammonium chloride flux tank. The scrubber for the 60 inch line has been installed.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets and U.S. EPA's Facility Pollution Prevention Guide, (EPA/600/R-92/088), you may contact the Ohio EPA Pollution Prevention Section at 740.644.3469 or me for additional information.

Please respond to these comments within 20 days of receipt of this notice. If you have any questions please contact me at 740/380-5284 at your convenience.

Since rely,

Ms. Abbot Stevenson Environmental Engineer

Permits and Enforcement Section

Division of Surface Water

AS/me

cc: Lisa Romito, Wheeling Pittsburgh Steel Steubenville North Plant Mike McCullough, DSW, CO (letter only)

NATIONAL DATA SYSTEM CODING SECTION A:

Permit #	NPDES	Yr/Mo/Day	Inspection Type	Inspector	Fac. Type
OIC00020*BD	OH0011339	99/5/12	S	S	2

FACILITY DATA SECTION B:

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Wheeling Pittsburgh Steel Corp. Martins Ferry Plant	10:00 a.m. 5/12/99	11/1/95
Martins Ferry, Ohio 43935	Exit Time	Permit Expiration Date
	1:00 p.m.	10/31/99

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Lisa Romito, Environmental Coordinator Tom Waligura, Manager, Environmental Control	304-234-2082
Name, Address and Title of Responsible Official	Phone Number
Dr. William Samples Wheeling Pittsburgh Steel Corp. 1134 Market Street Wheeling, WV 26003	304-234-2274

- SECTION C: AREAS EVALUATED DURING INSPECTION

S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated

M_	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	S	Compliance Schedules
S	Operations & Maintenance	U	Effluent/Receiving Waters	U	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	N	Other
'N	Collection System				

SECTION D: SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

SEE ATTACHED LETTER.

Name(s) and Signature(s) of Inspec

_ Ohio EPA, Southeast District Office

Ohio EPA, Southeast District Office

(Sections E through K: Complete on all inspections as appropriate. N/A = Not Applicable N/E = Not Evaluated)

ection E: PERMIT VERIFICATION

Inspection Observations Verify the Permit	Yes	No	N/A	N/E
(a) Correct name and mailing address of permittee	x			
(b) Correct name and location of receiving waters	х			
(c) Product(s) and production rates conform with permit application (industries)	x			
(d) Flows and loadings conform with NPDES permit	х			
(e) Treatment processes are as described in permit application/briefing memo	x			
(f) New treatment process(es) added since last inspection		х		
(g) Notification given to state of new, different, or increased discharges			х	
(h) All discharges are permitted		х		
(i) Number and location of discharge points are as described in permit		x		

Comments/Status:

- (c) back to pre-strike production levels
- (h) & (i) see item #2 in letter

SECTION F: COMPLIANCE SCHEDULES/VIOLATIONS

<u> </u>	Yes	No	N/A	N/E
(a) Any significant violations since the last inspection	X			
(b) Permittee is taking actions to resolve violations		X		
(c) Permittee has compliance schedule		X	ļ	
(d) Compliance schedule contained in				
(e) Permittee is meeting compliance schedule			X	

Comments/Status:

SECTION G:	OPERATION	AND	MAINTENANCE
SECTION G:	OPERATION	ANU	INIAINIENANCE

TREATMENT WORKS:

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
(a) Standby power available: Generator Dual Feed		х		
(b) Adequate alarm system available for power or equipment failures	Х			
(c) All treatment units in service other than backup units	X	ļ <u>.</u>		
(d) Sufficient operating staff provided: # of shifts 3 Days/Week 7	X			
(e) Operator holds unexpired license of class required by permit Class:			X	-
(f) Routine and preventive maintenance schedule/performed on time	X			
(g) Any major equipment breakdown since last inspection		X		
(h) Operation and maintenance manual provided and maintained	X			
(i) Any plant bypasses since last inspection	Х			
(j) Regulatory agency notified of bypasses on MORS 800 No.	X			
(k) Any hydraulic and/or organic overloads experienced since last inspection	X			

(b) 24 hour staffing (i) 5 occurrences in 1996 after last inspection; 2 in 1998. (k) hydraulic overloads during some rains.

COLLECTION SYSTEM:

		Yes	No	N/A	N/E
(a)	Percent combined system:%			X	
(b)	Any collection system overflows since last inspection (CSO)				
(c)	Regulatory agency notified of overflow (SSOs)				
(d)	CSO O and M plan provided and implemented				
(e)	CSOs monitored and reported in accordance with permit				
(f)	Portable pumps used to relieve system				
(g)	Lift station alarm systems provided and maintained				
(h)	Are lift stations equipped with permanent standby power or equivalent				; 1
(i)	Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection				
(j)	Any complaints received since last inspection of basement flooding				
(k)	Are any portions of the sewer system at or near capacity				

Comments/Status:

SECTION H: SLUDGE MANAGEMENT

(a)	Sludge Management Plan (SMP):	Submitted Date
		Approval Number
		Not submitted
		X N/A

				No N/A X	
		Yes	No	N/A	N/E
(b)	Sludge Management Plan current			х	
(c)	Sludge adequately disposed (Method:landfill)	X			
(d)	If sludge is incinerated, where is ash disposed of?				
(e)	Is sludge disposal contracted (Name: <u>USA WASTE</u>)	X			
(f)	Has amount of sludge generated changed significantly since last inspection		х		
(g)	Adequate sludge storage provided at plant	X			
(h)	Land application sites monitored and inspected per SMP			Х	
(i)	Records kept in accordance with state and federal law			х	
(j)	Any complaints received in last year regarding sludge		х		
(k)	Is sludge adequately processed (digestion, dewatering, pathogen control)			x	

Comments/Status:

SECTION I: SELF-MONITORING PROGRAM

PART 1: FLOW MEASUREMENT

·	Yes	No	N/A	N/E
(a) Primary flow measuring device properly operated & maintained Type of device: ultrasonic & parshall flume weir ultrasonic & weir X calculated from influent Other (Specify:)	x			
(b) Calibration frequency adequate (date of last calibration 3/26/99)	x			
(c) Secondary instruments (totalizers, recorders, etc.) properly operated and maintained	x			
(d) Flow measurement equipment adequate to handle expected ranges of flows	x			
(e) Actual flow discharged is measured		х		
(f) Flow measuring equipment inspection frequency: X Daily Monthly		Veekly Other		

Comments/Status:

- (a) Flow influent is metered and water used in treatment is metered and added.
- (b) Calibrated quarterly. Last done 2/98 (as of inspection).

PART 2: SAMPLING

		Yes	No	N/A	N/E
(a) Sampling location	n(s) are as specified by permit		x		
(b) Parameters and sa	ampling frequency agree with permit	x			
(c) Permittee uses re	quired sampling method	х			
(d) Sample collection	procedures are adequate	х			
(i) Samples refri	gerated during compositing	Х			
(ii) Proper preser	vation techniques used	Х			
Conform with	h 40 CFR 136.3	Х			
of three years inc	ds (e.g., flow, pH, D.O., etc.) maintained for a minimum cluding all original strip chart recordings (e.g., continuous mentation, calibration, and maintenance records)	х			
(f) Adequate records	maintained of sampling date, time, exact location, etc.	х			

Comments/Status:(a) Samples are to be taken at final discharge point; (d) Procedures are not adequate when discharge occurs over the weir wall because the samples are not representative of the discharge.

PART 3: LABORATORY

General	Yes	No	N/A	N/E
(a) EPA approved analytical testing procedures used (40 CFR 136.3)	х			
(b) If alternate analytical procedures are used, proper approval has been obtained			х	·
(c) Analyses being performed more frequently than required by permit		X		
(d) If (c) is yes, are results reported in permittee's self-monitoring report		,	х	
(e) Commercial laboratory used (1) Parameters analyzed by commercial lab: All except pH. flow and rainfall (2) Lab name: Antech Ltd.	x			

Qυ	ality Control/Quality Assurance	Yes	No	N/A	N/E
(f)	Quality assurance manual provided and maintained			х	
(g)	Satisfactory calibration and maintenance of instruments and equipment	Х			
(h)	Adequate records maintained	х			
(i)	Results of latest U.S. EPA quality assurance performance sampling program: 12/31/98 Date Satisfactory #18 Marginal X Unsatisfactory				

Comments/Status: (i) lead and oil and grease were unacceptable.

TION J: EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids		Other
001	NONE	NONE	CLEAR	NONE	NONE .	COLOR- LESS	

Comments/Status:

SECTION K: MULTIMEDIA OBSERVATIONS

	Yes	No	N/A	N/E
(a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories	X			
(b) Do you notice staining or discoloration of soils, pavement, or floors		х		
(c) Do you notice distressed (unhealthy, discolored, dead) vegetation		х		

(d) Do you see unidentified dark smoke or dustclouds coming from sources	х	
(e) Do you notice any unusual odors or strong chemical smells	х	
(f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities	х	

If any of the above are observed, ask the following questions:

- (1) What is the cause of the conditions?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

Comments/Status: (a) Significant amounts of oil & grease are reaching the wastewater treatment plant. Also, the storage area between the south end of the plant and the WWTP needs to be cleaned up.

Complete as appropriate for sampling inspections Do not attach this page when completing reports for evaluation inspections

SECTION L:	SAIVIFLING PROCEDORES (FOR CSIS)						
	X Grab samples obtained						
	X Composite obtained						
,	X Compositing frequency 250 ML/15 MIN Preservation						
	Flow proportioned sample obtained						
	X Automatic sampler used						
	X Sample split with permittee						
	X Chain of custody employed						
	Sample obtained from facility sampling device						
	Sample refrigerated during compositing: X Yes No Sample representative of volume and nature of discharge YES						
	Comments:						

NVENTORY M		(PLANT #2)	····	DATE: 10-22-99 TIME DOPM.	
TYPE OF WASTE	NUMBER OF CONTAINERS	LABELLED YES/NO	ACCUMULATION START DATE	CONDITION (LEAKING?)	
Chromium Chin Treat & Floor Dry	1-20 Vd.	YES	9-16-99	6000-Box # 2804k3 Tacp On Box	
48" 460" alkale Tank	1-30 Yd.	YES:	10-20-99	7 4 330340	
Sludge Waste	Box	YES	10-13-99	Torp Du Bokes	
Hydrockloric Acid Sludge Waste	1-30 Vd.			No Box On Site	
				;	
		·			•
					: :.:
Floor Dry In Stone 145 Bage	• :	. • •			
			•		
•					,• •
		_			·



September 25, 1998

Ms. Abbot Stevenson OEPA/SEDO 2195 Front Street Logan, Ohio 43138-0931

Re: Response to letter dated September 4, 1998

Wheeling-Pittsburgh Steel Corporation

Martins Ferry Plant

Compliance Sampling Inspection Correspondence

Dear Ms. Stevenson:

()

This letter is in response to your September 4, 1998 correspondence to William R. Samples relating to the April 13, 1998 compliance sampling inspection. Wheeling Pittsburgh Steel Corporation (WPSC) offers the following responses to your comments as noted below.

- 1) No Response Required
- 2) No Response Required
- 3) WPSC does not agree with the statement that the Martins Ferry facility is in violation of Part III, Section 11 of the NPDES permit for unauthorized discharges at the wastewater treatment plant (WWTP) in May, June, July, August, and September 1996 nor for June 1998. WPSC feels these incidents were authorized discharges because the treatment plant was operational according to the Ohio EPA PTI. WPSC will collect a grab sample of the discharge over the weir wall during excursions. WPSC welcomes your advice on modifying the permit to include weir overflows.

WPSC will request a proposal from our consulting engineers for possible alternative solutions to the weir overflow problem and for preventing oil/grease discharges.

4) A Monitor Well Gauging and Bailing Program has been established for the remediation of the UST location. Quarterly groundwater sampling is conducted to show natural attenuation is taking place. These quarterly reports are submitted to BUSTR. Results for the second quarter 1998 show there was no free product found in any of the wells and a continuing decrease in BTEX/GRO concentrations was evident. Monitoring is planned to continue for third and fourth quarters 1998.

Ms. Abbot Stevenson September 25, 1998 page 2

- 5) The coal pile located near the riverbank was removed from two retrofitted coal-fired boilers. The coal will be properly disposed of by the end of 1998.
- 6) No Response Required
- 7) A copy of the Martins Ferry Plant Storm Water Pollution Prevention Plan is enclosed. Appendix A, Storm Water Analytical Data, has been omitted as it has been previously supplied.
- Please see the attached excerpt from correspondence with Antech Ltd. regarding the January 6, 1997 DMRQA tests for lead and oil & grease.
- 9) WPSC will operate the oil skimmer for two consecutive hours per turn effective October 1, 1998. This operation should be sufficient to remove excess floating oil. Records will be kept at the WWTP to show that this procedure is being followed.
- 10) The consent decree with the Ohio Public Interest Research Group was terminated in October 1994. A copy of the cover letter is enclosed.
- 11) WPSC has contracted Chester Engineers to prepare the PTI for the addition of the fume scrubbers on the galvanizing lines. Submittal of the PTI is expected in October 1998.

If you have any questions, feel free to contact me at (740)283-5542.

Sincerely,

Lisa A. Romito

Environmental Coordinator



Southeast District Office

2195 Front Street Logan, Ohio 43138-9031 (740) 385-8501 FAX: (740) 385-6490

George V. Voinovich Governor

September 4, 1998

RE: BELMONT COUNTY
WHEELING PITTSBURGH STEEL
MARTINS FERRY PLANT
COMPLIANCE SAMPLING
INSPECTION
CORRESPONDENCE (I)

Dr. William Samples
Director - Environmental Control
Wheeling Pittsburgh Steel Corp.
1134 Market St.
Wheeling, WV 26003

Dr. Samples:

On April 13, 1998, Jim Grow, Ryszard Lecznar and I conducted a Compliance Sampling Inspection (CSI) at the Wheeling Pittsburgh Steel Corporation Martins Ferry (WPS-MF) plant. Larry Boroski and Pat Smith represented the Wheeling Pittsburgh Corporation during the inspection.

The purpose of the inspection was to determine the facility's compliance status with the terms and conditions of the NPDES permit, federal number OH0011339, state number 0IC00020*BD. Wastewater samples were collected and split with the company. Copies of the inspection report form and a summary of the effluent analyses are attached.

Based on the evaluation of the facility, Wheeling Pittsburgh Steel Corporation Martins Ferry was found to be in marginal compliance with the permit on the day of the inspection due to NPDES permit effluent and reporting violations. The following comments/problems were noted as a result of the inspection:

- 1. Wheeling Pittsburgh Steel Corp. was on strike from October 1, 1996 until September 1998. The facility reported no flow from October 1996 through March 1997. After March 1997, the company reported "no flow" and "information unavailable" for the months of April through August 1997.
- 2. The pH limit of 10.0 maximum was violated on June 24, 1998. There were also reporting violations in September 1997 for failure to monitor for TSS, oil & grease, temperature, lead, chromium, and zinc at the time when the plant was starting up after the strike. There have been no other effluent limit violations since the last inspection on May 7, 1996.
- 3. WPS-MF is in violation of Part III, Section 11 of the NPDES Permit for the following unauthorized discharges:
 - a. On May 9, 1996, a severe storm caused a bypass to occur over the weir wall for 25 minutes, as influent to the sump/lift station exceeded the capacity of the pumps to pump all the flow to the treatment plant (0.9 inches of rain fell in 50 minutes);
 - b. On June 19, 1996, a severe storm caused a bypass over the weir wall for a total of almost three hours, as influent to the sump/lift station exceeded the capacity of the pumps to pump all the flow to the treatment plant (2.8 inches of rain fell in 3 hours);



On July 3, 1996, a power outage caused a bypass to occur over the influent weir c.

wall because the lift station pumps were inoperable for approximately 45 minutes; On July 19, 1996, a severe storm caused a bypass over the weir wall for a total of about 5 minutes, as influent to the sump/lift station exceeded the capacity of the d. pumps to pump all the flow to the treatment plant (0.36 inches of rain fell in 45 minutes);

On August 15, 1996, a severe storm caused a bypass over the influent sump weir e. wall for approximately 11 minutes, as influent to the sump/lift station exceeded the capacity of the pumps to pump all the flow to the treatment plant (0.35 inches

of rain fell in 10 minutes);

On August 23, 1996, a severe storm caused a bypass over the influent sump weir f. wall for approximately 27 minutes, as influent to the sump/lift station exceeded the capacity of the pumps to pump all the flow to the treatment plant (0.8 inches

of rain fell in 45 minutes); On September 28, 1996, a severe storm caused a bypass over the influent sump weir wall for approximately 3 hours, as influent to the sump/lift station exceeded the capacity of the pumps to pump all the flow to the treatment plant (1.15 inches of rain fell in 24 hours; samples were taken);

On June 19, 1998, a severe storm caused a bypass over the weir wall for 6 to 8

h. hours, as influent to the sump/lift station exceeded the capacity of the pumps to

pump all the flow to the treatment plant (samples were taken);

i. From June 26 through 29, 1998, a series of severe storms caused a bypasses on and off over the weir wall, as influent to the sump/lift station exceeded the capacity of the pumps to pump all the flow to the treatment plant.

In addition, WPS-MF is in non-compliance with Part III Item (12)(B)(2) for failing to characterize the discharge by sampling to determine compliance with the effluent limitations. In the future, WPS-MF must sample the discharge over the weir wall to determine whether the discharge is in compliance with the effluent limitations. The results shall be reported to the Ohio EPA either in the written follow-up report, if there is a violation of the effluent limitations, or if no violation occurs, the data shall be reported on the monthly operating report.

WPS-MF must make every effort to prevent unauthorized discharges over the influent sump weir wall. It is recommended that the company examine ways to prevent this in the future, such as providing backup power, back flow prevention in the effluent line, reconfiguring the influent sump weir wall, removing some stormwater that may come from off site, or, modifying the NPDES permit to add discharges over the weir wall as a permitted outfall.

- Although outfall 601 was removed from the NPDES permit, please provide an update on 4. the status of the groundwater remediation project.
- 5. There is a stockpile of coal along the bank of the river near the wastewater treatment plant. What is this coal used for? How long will it be stockpiled? Please clean up this area and remove all the remaining coal as soon as it is no longer needed.
- The WPS-MF bioassay reports for outfall 001 since the last inspection indicate the 6. following results:

7/31-8/2/96 not acutely toxic;

12/17-19/97 3/12-14/98

4/15-19/98

not acutely toxic;
acutely toxic;
borderline acutely toxic
acutely toxic. The WPS-MF bioassay reports for stormwater outfalls 002, 003, 005 since the last inspection indicate the following results:

11/25/96 Effluents from outfalls 002, 003, 005 were all acutely toxic; 4/30/98 Effluents from outfalls 002 and 005 were acutely toxic.

During these same dates the combined rainfall/process water discharge from outfall 001 was also sampled. The results of these bioassays are:

11/25/96 Effluent was acutely toxic. 4/30/98 Effluent was acutely toxic.

This information will be used to evaluate this facility during the next permit renewal.

7. The chemical data from the stormwater testing shows very high levels of zinc in the runoff:

Zir	ic, ug/l
11/25/96	<u>4/30/9</u> 8
12,800	280
12,300	130
1,200	9,500
3,800	4,700
	NA
950	NA
1,000	2,400
530	2,700
NA	230
	11/25/96 12,800 12,300 1,200 3,800 1,100 950 1,000 530

The water quality based NPDES permit limits for total zinc are 910 ug/l daily maximum and 505 ug/l 30 day average. Eleven of the fifteen samples exceeded the daily maximum limit.

OEPA is very concerned about the level of zinc in the stormwater at your facility. Your NPDES permit required you to prepare a stormwater management plan. It is important for this plan to identify the sources of the above noted problems and any other pollution at the site and to specify practices used to reduce these pollutants in the stormwater. Please provide a copy of the plan to me within 30 days of receipt of this letter.

- 8. The results of the January 6, 1997 DMRQA testing indicates unacceptable results for lead and oil & grease. Provide an explanation for these results and a plan of action to prevent future unacceptable results. Also, the 1998 DMRQA results are not back yet. Apparently WPS-MF was late in submitting the samples. I have requested a copy of the results from our laboratory's QA/QC staff as soon as they are available.
- 9. During the inspection there was a significant amount of oil and grease in the influent sump/pump station. Although there is a device for oil and grease removal, there is significant concern that during high flow events, especially when untreated flow discharges over the weir wall, oil and grease is being discharged. Review your housekeeping procedures to minimize discharge of these pollutants to the wastewater treatment plant. Provide an explanation how you will prevent the discharge of oil and grease, especially during high flow events.
- 10. In 1990, WPS-MF entered into a consent decree with the Ohio Public Interest Research Group. Please provide a status of this consent decree. Has it been terminated? If yes, provide documentation.
- 11. Mr. Boroski indicated that WPS-MF is considering adding a hydrochloric acid scrubber. A Permit to Install (PTI) is required from the Division of Surface Water if the scrubber will create a discharge. Also, a PTI/PTO may be required by the Division of Air Pollution Control (DAPC). Please contact Dean Ponchak or Dan Canter of DAPC in the SE district office at 740.385.8501 for further information about their permitting requirements.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets and U.S. EPA's Facility Pollution Prevention Guide, (EPA/600/R-92/088), you may contact the Ohio EPA Pollution Prevention Section at 740.644.3469 or me for additional information.

Please respond to these comments within 20 days of receipt of this notice. If you have any questions please contact me at 740.380.5284 at your convenience.

perska i kalendar i Salaka Maraka kangarangan (1914-19

Sincerely

Ms. Abbot Stevenson
Environmental Engineer
Permits and Enforcement Section
Division of Surface Water

AS/me

cc: Lisa Romito, Wheeling Pittsburgh Steel Steubenville North Plant

cc: Randy Bournique, DSW-N, CO

L:\DATA\DSW\MARDI\STEVENSO\WPSMF98.CSI

TABLE II

COMPLIANCE SAMPLING DATA

ENTITY:Wheeling-Pittsburg Steel Corp. PLANT: Martins Ferry DATE SAMPLED: 4/13-14/1998

1				•					
STATION	T1	PARAMETER	<u>UNITS</u>	OHIO EPA LOADING CONC. (KG/D)		ENTITY LOADING CONC. / KG/D		PERMIT LIMITS LOADING CONC. / KG/D	
1 1 1 1 1 1		my say to		•	· ·				
0 0 1	G	pН	S.U.	9.90	-	9.9	-	6.5-10	0.0
	G [.]	TEMP.	°C	16	-	-	-	-	-
	G	COND	uhmos/cm	800	-	-	-	-	-
	С	FLOW	MGD	0.427	-	0.427	-	-	
Υ'	С	Hardness	mg/l	483	-	- ,	-	-	-
	С	ΑI	ug/l	<200	0.32	-	-	•	-
l	С	Cr	ug/l	<30	-	-	-	-	-
}	С	Cr-Hex.	ug/l	NA	-	<10	-	31	0.086
	С	Mg	mg/l	10	-	-	-	-	-
	С	Mn	ug/l	18	-	-	- .	-	-
	С	Ni	ug/l	<40	-	-	-	-	-
,	C	Zn	ug/l	121	0.19	69	0.11	910	2.53
	С	Cd	ug/l	<0.20	-	-	-	-	-
	C	As	ug/i	<2.0	-	-	-	-	-
	С	Pb	ug/l	<2.0	-	<10	-	-	-
ļ	G	O&G	mg/l	<1.0	<1.616	2.6	4.20	20	55.63
: A	С	TSS	mg/l	<5		3	-	-	844
	С	TKN	mg/l	1.7	-	-	-	-	-
	С	NH ₃	mg/l	1.51	2.44	-	-	-	-
	С	NO_3	mg/l	0.68	-	-	-	-	-
ì	С	P-tot.	mg/l	< 0.050) -	-	-	-	-
	G	CN-	ug/l	<10	-	-		-	-
	G	Phenoilics	ug/l	<10	-	-	-		-
İ		Bromoform	_	2.5	-	<5.0	-	-	-
	С	Dibromo- chlorometh	_	1.6	-	<5.0	-	-	-
	С	Bis(2-ethylhexy	/l) phthalate	е					
			ug/l	-		32	-	-	-

1SAMPLE TYPE: G = grab, C = composite



95 OCT 10 AM 9:21

W.R. Samples
Director Environmental Control
304-234-2744

3 October 1995

State of Ohio Environmental Protection Agency Southeast District Office 2195 Front Street Logan, Ohio 43138-9031

ATT: Mr. Rysard Lecznar
Supervisor
Compliance and Enforcement Unit
Division of Surface Water

RE: Wheeling-Pittsburgh Steel Corporation

Martins Ferry Wastewater OEPA NPDES Inspection

Response to 19 September 1995 OEPA Letter

Dear Mr. Lecznar,

Wheeling-Pittsburgh Steel Corporation is in receipt of your 19 September 1995 correspondence concerning the 29-30 June 1995 Wastewater OEPA NPDES Compliance Sampling Inspection of it's Martins Ferry, Ohio facility. This letter is written in response to your 19 September correspondence and is offered to update your office as to plant activities performed in an effort to maintain compliance with NPDES Regulations.

Item 1:

The NPDES Permit for Martins Ferry Outfall 001 states that any individual excursion from the specified range of acceptable pH values (6.5 S.U. to 10.0 S.U.) shall not exceed 60 minutes. on 9 December 1994, the pH at Outfall 001 was recorded at above 10.0 S.U. for a period of 89 minutes with a maximum of 10.8 S.U.. The high pH was caused by an overflow of an alkali tank on a galvanizing line which allowed high pH solution to travel directly to the Waste Water Treatment Plant (WWTP). To avoid the potential for any future similar incident, the alkali tank overflow has been directly connected to a holding system.



Wheeling-Pittsburgh Steel Corporation Mr. Ryszard Lecznar 3 October 1995 Page:2

The NPDES Permit for Martins Ferry Outfall 001 specifies an allowable daily zinc level of 1200 ug/l and a monthly average zinc level of 505 ug/l. On 8 March 1995, the daily zinc level was recorded as 1700 ug/l. The monthly average level for zinc was recorded as 554 ug/l. The cause of the excursion was found to be insufficient polymer feedrate, producing zinc carryover in the effluent. The polymer feed system was changed to automatically adjust the polymer feedrate when changes in the influent flowrate occur.

Item 2:

No comment.

Item 3:

Wheeling-Pittsburgh Steel Corporation (WPSC) submitted a letter dated 12 September 1995 with comments on the proposed NPDES permit in response to Public Notice No. OEPA-95-08-058. At this time, WPSC is currently waiting for OEPA to review comments on the proposed NPDES permit.

If you have any questions concerning this letter, please contact Thomas Webster at (614) 859-6766.

Very truly yours,

Wheeling-Pittsburgh Steel Corporation

W.R. Samples

Director-Environmental Control

cc:

R.H. Carter

L.R. Boroski

P.K. Morrison

J.W. Stratman

WRS/TJW/MFile

TDW/MFFile

August 28, 1992

MEMORANDUM

SUBJECT:

Compliance Sampling Inspection (CSI) -- Wheeling-Pittsburgh Steel Corporation (WPSC), Martins Ferry Plant, Martins Ferry, Ohio (OH0011339, AFE116:S4)

FROM:

David R. Barna, Environmental Engineer

THRU:

A. R. Winklhofer, Chief Eastern District Office (SE-W)

TO:

Compliance Section (WC-15J)

Michael Mikulka, Chief

On May 6-7, 1992, EDO conducted a CSI at WPSC Martins Ferry plant in response to a Water Division request. A completed data set was received from the Central Regional Laboratory on June 18, 1992. Attached is a CSI field report. A copy of the report was requested by WPSC.

If you have any questions, contact me at FTS 216/522-7260.

Attachments

J. 100 M. J.	CONCURRENCES									
JOL,		SEZW	· · · · · · · · · · · · ·							
NAME	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	PEL				***************************************		• •••••••••••	M	
DATE	8-29-92	8./28/92	8/28/0	17]	••••••	•••••	**********		XX	
EPA Ferm	1320-1 (12-70)							OFFICIA	L FILE COPY	



May 18, 1992

ERROL C. SAMBUCO DIRECTOR-ENGINEERING (304) 234-2577

U.S.Environmental Protection Agency Region V Eastern District Office 25089 Center Ridge Road Westlake, Ohio 44145

Att: Mr. David R. Barna, Environmental Engineer

Re:WHEELING-PITTSBURGH STEEL CORP.

MARTINS FERRY PLANT

WASTEWATER COMPLIANCE INSPECTION OF MAY 6-7, 1992

Dear Mr. Barna:

Per your request to Mr. Thomas Waligura, Assistant Manager-Environmental Control, enclosed are copies of the following documents pertaining to the Martins Ferry Plant:

- 1. Monthly Discharge Monitoring Reports (Apr 1991 Mar 1992).
- 2. Quarterly Biomonitoring Results for the Fourth Quarter of 1991 and the First Quarter of 1992.
- 3. Letters written to OEPA, dated Oct. 21, 1991, Dec. 13, 1991, and March 13, 1992, regarding exceedances of permit limitations.

We need to call your attention to an error that was discovered on the Monthly Discharge Monitoring reports. Please note that in Feb. 1992, an adjustment was made to the flow values to reflect the "end date" of the flow period. It was discovered that plant personnel had entered dates on the flow charts and on monitoring samples for Outfall 001 in such a manner that, when the data was collated for inclusion on monthly operating reports, the sample concentration was entered on the sample pickup day ("end date") while flows were entered for the flow "start date". For example, a flow chart placed on the flow meter on 3/1 was marked 3/1 and would be picked up on 3/2. A different team, from the lab, collected 24 hour composite samples and routinely marked the sample with the date they picked up the composite. So that a sample started on 3/1 would have been marked as 3/2. Therefore, prior to Feb. 1992, the flows reflected on the Monthly Discharge Monitoring reports are actually one day behind the sample data for the respective period.

Page: 2

If we can be of further assistance, please contact Mr. Thomas Waligura at (304) 234-2682.

Very truly yours,

Errol C. Sambuco Director-Engineering

TJW/ECS/tjw Enclosure